

RECEIVED

JAN 13 1993

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

MM Docket No. 92-228
Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
Allouez, Wisconsin)

RM-8079

To: The Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS

Michael R. Walton (Walton), through his attorneys and pursuant to section 1.420 of the rules and the Commission's Public Notice released December 29, 1992 (Report No. 1922, released December 29, 1992, FCC Mimeo 31125), hereby files comments in opposition to counter proposals filed jointly by Wheeler Broadcasting, Inc. and Midwest Dimensions, Inc. (Wheeler), and by Julian Jetzer d/b/a Sheboygan Falls Broadcasting (SFB) in the above-referenced Notice of Proposed Rule Making (Notice).¹ In support thereof, the following is shown:

1. Walton proposes amendment of Section 73.202(b), Table of Allotments, to allot Channel 294C to Allouez, Wisconsin in anticipation of applying for a construction permit to provide first local service to that community. SFB proposes to allot Channel 294A at Sheboygan Falls, Wisconsin. Wheeler, licensee of Station WOWN, Shawano, Wisconsin, proposes to amend the table of allotments by changing its own channel and imposing two

¹ While Report No. 1922 did not list the Wheeler proposal, these comments nonetheless address both proposals in the interest of administrative efficiency.

No. of Copies rec'd
List A B C D E

045

additional channel substitutions in order to eliminate WOWN's short spacing to two other stations (WBNZ at Frankfort, Michigan, and WPKR(FM) at Waupun, Wisconsin). Specifically, Wheeler proposes the following modifications: WOWN, Shawano, Wisconsin would move from 257C3 to 295C3; Station WOCO-FM, Oconto, Wisconsin would move from 296A to 246A; and Station WGLQ, Escanaba, Michigan would move from 246C to 245C. The SFB and Wheeler proposals are compatible with one another, but are mutually exclusive with Walton's proposal.

2. A weighing of the relevant factors compels the conclusion that the Allouez allotment is far superior to the competing proposals, and should, therefore, be granted. In particular, Walton's proposal will achieve first local service to a far greater area and population than that which would be achieved by a Class A allotment at Sheboygan Falls. Further, the SFB and Wheeler counter proposals are wholly inconsistent with the Commission's policies in FM rule making proceedings, and adoption of Wheeler's proposal in particular would disrupt existing station operations without providing any significant public benefits.

3. Preliminarily, contrary to SFB's suggestion (SFB Comments, p. 2), Allouez, Wisconsin is a licensable community with no local FM service, and therefore should receive the applicable 307(b) allotment priority. A municipality need not provide every public service on its own to merit community status;

rather, the Commission requires only sufficient indicia of community status for allotment purposes. Beacon Broadcasting, 63 RR 2d 794 (1987); FM Channel Assignments, Semora, North Carolina, 67 RR 2d 610 (1990)². The absence of a local newspaper and the existence of a cooperative arrangement for police protection do not preclude a finding that Allouez is a community. Semora, North Carolina, supra. As shown in Walton's Petition for Rule Making (p. 2, para. 2), Allouez possesses ample indicia of autonomy and independence to satisfy the Commission's requirements for community status. Allouez is an incorporated village with an independent self governing structure which provides municipal services. Allouez contains a variety of businesses, social, religious and civic organizations, and is listed in the 1990 Census as having a population of 14,431. It is in no way completely dependent upon Green Bay, nor has either SFB or Wheeler adduced any evidence in support of such proposition. By any measure, Allouez is a community for the Commission's licensing purposes.³

² Semora, North Carolina, 67 RR 2d 610 (absence of local newspaper and bank, coupled with the existence of a cooperative arrangement for police protection, educational services and other municipal services did not defeat Semora's community status for allotment purposes).

³ See also, FM Channel Assignments, Princeville, Hawaii, 67 RR 2d 644 (Mass Med. Bur., 1990) (even though it only had a population of 800, the presence of a business district, its own post office and a separate zip code rendered Princeville a community); FM Channel Assignments, Evans, Georgia, 67 RR 2d 113 (Mass Med. Bur., 1989) (suburb of Augusta, Georgia with a population of 800 was found to be

4. In accordance with Commission priorities for FM service set forth in Revision of FM Assignment Policies & Procedures, 90 F.C.C.2d 88, 91 (1982), Allouez is clearly the preferred allotment vis a vis Sheboygan Falls. The Commission's priorities for FM service are as follows:

- (1) First full-time aural service;
- (2) Second full-time aural service;
- (3) First local service;
- (4) Other public interest matters.

Neither proponent secures an advantage under either priorities (1) or (2) because the two areas involved are well served. Both Walton and SFB propose first local service. Allotment at Allouez, however, will serve a more populous community and cover a greater service area than will allotment at Sheboygan Falls. For these reasons alone, Allouez is unquestionably the preferred allotment.

5. Where competing proposals qualify for a first local service priority, Commission policies favor the allotment

a community for allotment purposes where the community had two high schools, a middle school and an elementary school, its own post office and a separate phone directory published by Southern Bell); FM Channel Assignments, Virgie, Kentucky, 66 RR 2d 1831 (Mass Med. Bur., 1989) (even though Virgie was neither incorporated nor listed in the 1980 U.S. Census, Virgie was found to be a community because it had its own post office, volunteer fire department, public library and business district); Elijah Broadcasting Co., 65 RR 2d 461 (Rev. Bd., 1988) (Reston, Virginia entitled to 307(b) preference even though located within the Washington, D.C. metropolitan area).

that will achieve greater coverage area and serve a larger population. FM Channel Assignments, Greenup, Kentucky and Athens, Ohio, 68 R.R.2d 1437 (1991). Attached hereto as Attachment A, is an Engineering Statement prepared by Mr. Walton's consulting engineer which discusses the difference in coverage and service areas proposed by Walton and SFB. Walton proposes a Class C3 channel in Allouez, a community whose population of 14,431 is well over twice that of Sheboygan Falls. Walton's proposed coverage area would be 4,782.6 square kilometers, and the signal would reach a population of 279,360. SFB's proposed Class A channel in Sheboygan Falls, a community with a population of only 5,823, would achieve a coverage area of 2,515.3 square kilometers, and reach a total population of 112,151. In comparing proposals, the Allouez allotment would not only serve a substantially larger population, but also would achieve far greater signal coverage.⁴

⁴ Although Wheeler suggests (Wheeler Comments, p. 2) that Allouez is adequately served by broadcasters in the Green Bay metro area, this factor is irrelevant under the FM assignment priorities. Moreover, even if relevant, that Allouez is in fact less well served than Sheboygan Falls not only undermines SBF's argument, but weighs in favor of the Allouez allotment. Attached hereto as Attachment B, are excerpts from Arbitron's 1992 County Coverage Report for Wisconsin, listing those stations achieving "measurable ratings" in Brown and Sheboygan Counties (Allouez is located in Brown County and Sheboygan Falls is located in Sheboygan County). Counting stations that achieved measurable ratings, Arbitron reports that Sheboygan County's 85,600 residents are served by 38 stations, and Brown County's 161,000 residents are served by only 25 stations. Arbitron's data clearly demonstrates that Sheboygan County is substantially

6. Wheeler's proposal must be summarily dismissed because it is no more than a mere preference for a fully-spaced site designed to serve Wheeler's private interests, while causing substantial disruption to existing services. Cf., FM Channel Assignments, Campbellsville, Kentucky, 4 FCC Rcd 5770 (1989); FM Channel Assignments, Neenah-Menasha, 4 FCC Rcd. 5244 (1989). In addition to its own voluntary channel change, Wheeler's proposal requires forced channel changes for two existing FM stations. It should be emphasized that the Commission will not entertain requests for displacement of more than two stations merely to accommodate another licensee's proposed modification; the two-station requirement reflects the barest showing which must be made to secure any Commission consideration whatsoever. Columbus, Nebraska, 59 RR 2d 1184 (1986). Examination of Wheeler's proposal reveals that it has made utterly no showing of any relevant public interest factors which would justify the extraordinary dislocation of two existing licensees. On the contrary, the proposal advances only Wheeler's own narrow interest in eliminating a slight short-spacing caused by its recent upgrade and modification. Nowhere has Wheeler addressed the very issues of station and service disruption mandated by Columbus, Nebraska.

7. In addition to disrupting FM service, Wheeler's proposed alteration will also disrupt station business and

better served by radio outlets than Brown County. Any suggestion or implication to the contrary is simply insupportable.

necessitate extensive promotional efforts by the displaced stations to recover and/or maintain listeners and advertisers. As the ultimate beneficiary of its proposed changes, Wheeler would be required to reimburse the two stations forced to shift frequencies in accordance with Circleville, Ohio, 9 RR 2d 1579 (1967). See also, Columbus, Nebraska, 59 RR 2d 1184 (1986). Wheeler has neither offered to reimburse, nor made any showing that it is capable of reimbursing the two stations which would be forced to move. For this reason and for its failure to address the Columbus, Nebraska public interest factors, Wheeler's proposal is defective on its face and should be denied.

8. It should be stressed that Wheeler's selection of a short-spaced site is wholly voluntary, unnecessary, and in fact results in diminished service to its community of license. In 1990 the Commission granted Wheeler's proposed amendment to the Table of Allotments, substituting FM Channel 257C3 for Channel 257A at Shawano, Wisconsin. Report & Order, 5 F.C.C.Rcd. 5268 (1990). Pursuant to that decision, Wheeler filed a minor modification application (FCC File BPH-910607IB) proposing to relocate its site for WOWN closer to Green Bay. As observed in the attached Engineering Statement, Wheeler created the short-spacings of which it now complains and had to make a showing of good cause to justify city grade coverage of Shawano reduced substantially below 100%. In particular, Wheeler's proposed site created short spacings between WOWN and Station WBNZ, Frankfort,

Michigan, and Station WPKR(FM) Waupun, Wisconsin, of four and eight kilometers, respectively. Wheeler proposed to utilize a directional signal to protect the two stations. Wheeler's currently proposed site would provide substantial coverage of Green Bay while reducing coverage of Shawano. In short, Wheeler has voluntarily selected its site for the purpose of maximizing coverage of Green Bay while providing the bare minimum of required coverage of its community of license.

9. As the attached Engineering Statement also shows, Wheeler has at least two less disruptive and more sensible means of achieving its asserted goals (i.e., reducing short spacings). Wheeler's currently licensed site meets all spacing requirements. Moreover, there is a substantial geographic area in which Wheeler could locate its facility consistent with all applicable spacing requirements. By utilizing either of these two alternatives, Wheeler could not only eliminate the short spacings of which it complains, but could at the same time provide full city grade coverage to Shawano, its community of license.

10. In the face of the availability of two superior alternatives, Wheeler's position compels the conclusion that its true object is to continue Green Bay coverage at the expense of fully serving Shawano. Rather than select either of the two viable options, Wheeler would have the Commission impose massive disruption of the current allotment scheme and deny the Allouez

allotment to eliminate two modest short-spacings. Wheeler's proposal is unjustified and unnecessary, and should be rejected.

11. Finally, it is noteworthy that Wheeler's joint filer, Midwest Dimensions, Inc., licensee of Station WPKR at Waupun, Wisconsin, has no cognizable interest in this matter at all. Regardless of the Commission's ultimate disposition of this rule making, Wheeler's Station WOWN is required to protect Midwest's Station WPKR. Midwest would not be subject to modification, substitution or additional signal interference under any of the competing proposals. Indeed, no short-spaced station is affected by Wheeler's authorized modification inasmuch as Wheeler is required to fully protect all short-spaced facilities.⁵

Conclusion

12. The foregoing facts and circumstances compel the conclusion that Walton's proposal should be adopted and both the SFB and Wheeler proposals should be rejected. An allotment at Allouez, Wisconsin would provide first local service to a community that is substantially larger than Sheboygan Falls. Walton's Allouez proposal would result in coverage of a far greater area and far larger population than that proposed by

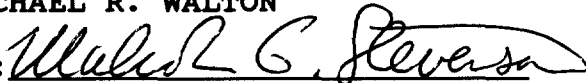
⁵ Wheeler states that Station WDBK, Algoma, Wisconsin, apparently has agreed in principle to relocate its transmitter site to a non-short-spaced location should Wheeler's proposal be granted. (Wheeler Comments, Engineering Statement at 2). This is irrelevant, and in any event Wheeler is required to protect all other stations, short spaced or not, from prohibited interference.

SFB's Sheboygan Falls proposal. Wheeler's wholly self-serving proposal must fall because it would deny Allouez a first local service and impose substantial service disruption and inconvenience on two operating FM stations with no countervailing public benefits.

WHEREFORE, for the foregoing reasons Walton respectfully urges the Commission to allot Channel 294C3 at Allouez and reject the proposals of Wheeler and SFB.

Respectfully submitted,

MICHAEL R. WALTON

By: 
Malcolm G. Stevenson

SCHWARTZ, WOODS & MILLER
Suite 300, The Dupont Circle Building
1350 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 833-1700

Its Attorneys

Harry R. Seabrooke

RR #5 Box 456-A

COMMUNICATIONS CONSULTANT

Hedgesville, WV 25427-9224

Michael R. Walton
Allouez, Wisconsin

ENGINEERING STATEMENT

This statement has been prepared on behalf of Michael R. Walton in support of his petition in RM-8079 (MM Docket No.92-228) to allot Channel 294C3 to Allouez, Wisconsin and his opposition to the counter proposal of Julian R. Jetzer to allot Channel 294A to Sheboygan Falls, and to the reply comments of Wheeler Broadcasting and Midwest Dimensions requesting the allotment of Channel 295C3 to Shawano, both Wisconsin, each proposing denial of the requested allotment of Channel 294C3 to Allouez.

An analysis of the Jetzer proposal has been made for the reference site specified in the its petition and assuming facilities of 6 Kw ERP at 100 meters AAT, including a determination of the area and population which can be served, in comparison to that which can be achieved by the Walton Channel 294C3 proposal for Allouez. The Walton proposal will serve within its predicted Channel 294C3, 25 Kw, 1 mV/m contour an area of 4,782 square kilometers containing a 1990 U.S. Census population of 279,360 persons including a first local service to the incorporated community (village) of Allouez, which has a 1990 population of 14,431 persons. The Jetzer proposal will serve an area of 2,515 square kilometers with a population of 112,151 persons within its Class A 1 Mv/m contour, including Sheboygan Falls with its 1990 population of 5,823 persons.

An analysis of the Channel 257C3 allotment to WOWN at Shawano has been made to determine if any restrictions exist on Channel 257C3 which mandate a change to Channel 295C3 and denial of a first local service to Allouez. A spacing check was made for the licensed Channel 257A site of WOWN showed that the licensed Class A site is short spaced to WPKR Waupun but that it meets the spacing requirement toward WBNZ Frankfort, Michigan. Another Channel 257C3 spacing study has been made which revealed that there is an area beginning at geographic coordinates North Latitude 44°51'30"; West Longitude 88°23'30" and extending south and west for at least 1.3 km and 4.4 km, respectively, in which WOWN can meet all the spacing requirements of Section 73.207 and serve 100 percent of Shawano with a signal of at least 70 dbu, as required by Section 73.315. Further, this site will clear the spacing requirement to WBNZ Frankfort, Michigan by 1.9 km and the spacing to WPKR Waupun by 1.3 km. This spacing study is contained as Appendix I herein.

ENGINEERING REPORT

Harry R. Seabrooke

RR #5 Box 456-A

COMMUNICATIONS CONSULTANT

Hedgesville, WV 25427-9224

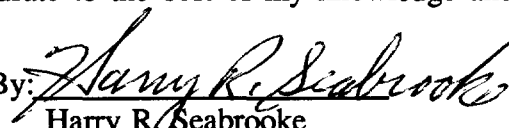
Michael R. Walton
Allouez, Wisconsin

ENGINEERING STATEMENT (Cont'd)

It should be noted that, pursuant to the Report and Order in MM Docket No. 89-511 (5 FCC Rcd 5268 (1990)), WOWN was authorized a channel upgrade to Channel 257C3. WOWN filed an application (FCC File No. BPH-910607IB) to upgrade to Channel 257C3 at a new site located closer to Green Bay which in fact proposed a diminution of 70 dbu city grade service to Shawano. See, in this connection, WOWN application, Exhibit E-6. It appears that the authorized Channel 257C3 site was chosen to maximize coverage to Green Bay at the expense of complete 70 dbu coverage of Shawano and the creation of two short spacings of 4 km and 8 km, respectively, toward WBNZ and WPKR, requiring the use of a directional antenna to provide protection.

It is concluded that there is no need to deny an efficient first local service to the Allouez community in order for WOWN to find a Class C3 transmitter location meeting all the spacing requirements of Section 73.207 and provide 70 dbu service to all of Shawano. It is further concluded that the authorized Channel 257C3 facilities of WOWN provide complete protection to the stations to which WOWN is currently short spaced as required by the FCC Rules .

I certify that my qualifications are matter of record at the FCC, and that I have personally prepared this report. All computations and data contained herein or on which this exhibit has been based are in accordance with the pertinent requirements of the FCC Rules, appropriate international broadcasting agreements and standards of good engineering practice, unless otherwise specifically so stated. I declare under the penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

By: 
Harry R. Seabrooke
January 12, 1993

ENGINEERING REPORT

Harry R. Seabrooke

RR #5 Box 456-A

COMMUNICATIONS CONSULTANT

Hedgesville, WV 25427-9224

Michael R. Walton
Allouez, Wisconsin

APPENDIX I

Title: Channel 257C3 Spacing Study
Reference City: Shawano, WI
Translators Are Not Included

Latitude: 44-51-30
Longitude: 88-23-30

Call City of	Auth License	Licensee Name St FCC File No.	Chan Freq	ERP-kW EAB-m	Latitude Longitude	Az-to -from	Dist (km)	Req (km)
USED			256C2		46-06-03	355.3	138.58	117
Iron River	MI		99.1		88-32-23	175.2	21.58	CLEAR
EFFECTIVE 11-3-88-RSVD FOR WIKB PER D87-592 Docket: 87-592								
WIKBFM	LIC	Northland Advertising	256C2	50.0	46-06-03	355.3	138.58	117
Iron River	MI	BLH-890731KD	99.1	150	88-32-23	175.2	21.58	CLEAR
WOWN	CP	Wheeler Broadcasting,	257C3	14.0*	44-45-14	158.5	12.48	153
Shawano	WI	BPH-910607IB	99.3	134	88-20-01	338.5		
From Channel 257A per 89-511								
WOWN	LIC	Wheeler Broadcasting,	257A	3.00	44-46-47	245.3	20.88	142
Shawano	WI	BLH-7438	99.3	55	88-37-53	65.1		
*To Channel 257C3 per D89-511								
WIGMFM	LIC	WIGM, Inc.	257C3	23.0	45-09-51	283.2	157.40	153
Medford	WI	BLH-911011KC	99.3	104	90-20-28	101.8	4.40	CLOSE
From Channel 257A per D89-217								
Class B1 with Respect to Canada								
WBNZ	CP	Forum Communications,	257C2	50.	44-36-38	98.1	178.86	177
Frankfort	MI	BPH-900320ID	99.3	125	86-09-38	279.7	1.86	CLOSE
From channel 257A per D88-269								
WBNZ	LIC	Forum Communications,	257A	1.45	44-36-38	98.1	178.86	142
Frankfort	MI	BLH-780919AB	99.3	125	86-09-38	279.7	36.86	CLEAR
*To Channel 257C2 per D88-269								
Class B1 with respect to Canada								
WPKR	LIC	Midwest Dimensions, I	258C2	50.0	43-50-51	198.4	118.33	117
Waupun	WI	BLH-900816KB	99.5	128	88-51-31	18.1	1.33	CLOSE
*TO OMRO, WI PER D90-529								
VACANT			258C2		43-50-51	198.4	118.33	117
Omro	WI		99.5		88-51-31	18.1	1.33	CLOSE
EFFECTIVE 8-12-91-RSVD FOR WPKR PER D90-529 Docket: 90-529								
WHET	LIC	Davison Communication	259C2	46.	44-38-08	112.0	65.43	56
Sturgeon Bay	WI	BLH-910211KD	99.7	156	87-37-37	292.6	9.43	CLEAR
USED			259C2		44-54-23	85.8	80.83	56
Sturgeon Bay	WI		99.7		87-22-15	266.6	24.83	CLEAR
EFFECTIVE 10-10-86 RESERVED FOR WSBW PER D85-378 Docket: 85-378								

End of Constraints Study FM Channel 257C3

**NEW
POPULATION ESTIMATES**

Populations for this report are
based on **1990 Census** data.
See Page i for details.

ARBITRON

T H E A R B I T R O N C O M P A N Y



Radio County Coverage

Wisconsin

**1992 Edition
Fieldwork Conducted 1991**

County Report

1992 Edition Radio County Coverage

Fieldwork Conducted 1991

© 1992 The Arbitron Company

WISCONSIN

COUNTY:
BROWN

HOME RADIO METROS:
GREEN BAY

POPULATION 12+: 161,000

IN-TAB: 745

TELEVISION ADI:
GREEN BAY-APPLETON

ETHNIC WGT: NONE

METRO STATION COUNTY/STATE OF LICENSE			MONDAY - SUNDAY 6AM - MID					MONDAY - FRIDAY 6AM - 7PM				
			CUME (00)	RTG	RTG	AQH SHR	CTY SHR	CUME (00)	RTG	RTG	AQH SHR	CTY SHR
APPLETON-OSHKOSH												
WAPL-F	OUTAGAMIE	WI	465	28.9	2.4	13.7	19.6	399	24.8	3.4	14.4	21.2
WEMI-F	WINNEBAGO	WI	28	1.7	.1	.4	10.0	21	1.3	.1	.3	7.7
WHBY-A	OUTAGAMIE	WI	16	1.0	-	-	-	7	.4	-	-	-
WKFX-F	OUTAGAMIE	WI	207	12.9	.7	3.9	33.3	175	10.9	.9	3.7	33.3
WNAM-A	WINNEBAGO	WI	174	10.8	1.2	7.0	33.3	161	10.0	1.7	7.3	34.6
WOZZ-F	OUTAGAMIE	WI	155	9.6	.4	2.5	20.0	121	7.5	.6	2.4	20.5
WQWM-A	OUTAGAMIE	WI	51	3.2	.2	1.1	21.4	45	2.8	.2	1.0	21.1
WROE-F	WINNEBAGO	WI	24	1.5	.1	.4	2.9	22	1.4	-	-	-
WYNE-A	OUTAGAMIE	WI	41	2.5	.1	.7	13.3	27	1.7	.2	.8	12.0
METRO SHARE CONTRIBUTION						29.7					29.9	
CHICAGO												
WGN -A	COOK	IL	23	1.4	.1	.4	.1	15	.9	.1	.3	.1
METRO SHARE CONTRIBUTION						.4					.3	
GREEN BAY												
WDUZ-A	BROWN	WI	280	17.4	1.2	6.7	95.0	246	15.3	1.9	7.9	96.8
WGEE-A	BROWN	WI	310	19.3	1.7	9.8	59.6	275	17.1	2.5	10.8	61.2
WHET-F	DOOR	WI	168	10.4	.6	3.2	52.9	141	8.8	.6	2.6	55.6
WIXX-F	BROWN	WI	709	44.0	3.3	18.6	35.3	612	38.0	4.2	17.6	36.6
WJLW-F	BROWN	WI	212	13.2	1.0	5.6	48.5	186	11.6	1.2	5.0	43.2
WNFL-A	BROWN	WI	287	17.8	1.2	6.7	86.4	225	14.0	1.4	6.0	79.3
WQLH-F	BROWN	WI	377	23.4	1.8	10.2	50.0	324	20.1	2.7	11.5	52.4
METRO SHARE CONTRIBUTION						60.8					61.4	
MILWAUKEE-RACINE												
WISN-A	MILWAUKEE	WI	16	1.0	.1	.7	1.7	14	.9	.2	.8	1.6
WTMJ-A	MILWAUKEE	WI	41	2.5	.1	.4	.3	20	1.2	.1	.3	.3
METRO SHARE CONTRIBUTION						1.1					1.1	
NON-METRO												
WAUN-F	KEWAUNEE	WI	50	3.1	.3	1.8	35.7	40	2.5	.4	1.6	35.3
WCUB-A	MANITOWOC	WI	15	.9	.1	.4	6.3	11	.7	.1	.3	4.3
WDOR-F	DOOR	WI	18	1.1	.1	.4	11.1	11	.7	.1	.3	9.1
WIFC-F	MARATHON	WI	20	1.2	-	-	-	12	.7	-	-	-
WRVM-F	OCONTO	WI	18	1.1	.1	.4	6.3	11	.7	.1	.3	5.6
WYCO-F	MARATHON	WI	25	1.6	.1	.4	4.3	20	1.2	.1	.3	2.9
NON-METRO SHARE CONTRIBUTION						3.4					2.8	
OTHERS						5.3					4.7	
COUNTY TOTALS												
			CUME (00)			1569		CUME (00)			1549	
			CUME RTG			97.5		CUME RTG			96.2	
			AQH (00)			285		AQH (00)			381	

County Report

1992 Edition Radio County Coverage

Fieldwork Conducted 1991

© 1992 The Arbitron Company

37

WISCONSIN

COUNTY:
SHEBOYGAN

HOME RADIO METROS:

POPULATION 12+: 85,600

IN-TAB: 304

TELEVISION ADI:
MILWAUKEE

ETHNIC WGT: NONE

METRO	STATION	COUNTY/STATE OF LICENSE	MONDAY - SUNDAY 6AM - MID					MONDAY - FRIDAY 6AM - 7PM				
			CUME (00)	RTG	RTG	AQH SHR	CTY SHR	CUME (00)	RTG	RTG	AQH SHR	CTY SHR
APPLETON-OSHKOSH												
WAPL-F	OUTAGAMIE	WI	143	16.7	1.3	7.5	5.5	127	14.8	1.5	6.7	5.0
WLKE-A	WINNEBAGO	WI	11	1.3	-	-	-	11	1.3	.1	.5	16.7
WMBE-A	CALUMET	WI	24	2.8	.2	1.4	25.0	21	2.5	.2	1.0	25.0
WPKR-F	FOND DU LAC	WI	11	1.3	-	-	-	8	.9	-	-	-
WYNE-A	OUTAGAMIE	WI	10	1.2	-	-	-	10	1.2	-	-	-
METRO SHARE CONTRIBUTION						8.9		8.2				
CHICAGO												
WBBM-A	COOK	IL	26	3.0	.1	.7	.2	21	2.5	.2	1.0	.2
WGN-A	COOK	IL	35	4.1	.4	2.1	.2	19	2.2	.4	1.6	.2
WIND-A	COOK	IL	8	.9	-	-	-	8	.9	.1	.5	.6
WLUP-A	COOK	IL	11	1.3	-	-	-	3	.4	-	-	-
WMAQ-A	COOK	IL	30	3.5	.1	.7	.2	19	2.2	.1	.5	.2
METRO SHARE CONTRIBUTION						3.5		3.6				
GREEN BAY												
WIXX-F	BROWN	WI	110	12.9	.7	4.1	4.0	99	11.6	.7	3.1	3.3
WQLH-F	BROWN	WI	8	.9	-	-	-	8	.9	-	-	-
METRO SHARE CONTRIBUTION						4.1		3.1				
MILWAUKEE-RACINE												
WBWI-F	WASHINGTON	WI	11	1.3	.1	.7	10.0	5	.6	.1	.5	6.7
WEMP-A	MILWAUKEE	WI	13	1.5	-	-	-	13	1.5	.1	.5	2.4
WEZW-F	MILWAUKEE	WI	66	7.7	.8	4.8	5.1	56	6.5	1.2	5.2	5.1
WFMR-F	WAUKESHA	WI	10	1.2	.1	.7	1.9	8	.9	.1	.5	1.4
WISN-A	MILWAUKEE	WI	75	8.8	.5	2.7	3.4	65	7.6	.8	3.6	3.7
WKKV-F	RACINE	WI	10	1.2	-	-	-	8	.9	-	-	-
WKLH-F	MILWAUKEE	WI	96	11.2	.8	4.8	4.2	88	10.3	1.2	5.2	4.2
WKTJ-F	MILWAUKEE	WI	159	18.6	.9	5.5	5.0	131	15.3	1.1	4.7	4.0
WLTQ-F	MILWAUKEE	WI	27	3.2	.1	.7	1.0	24	2.8	.1	.5	.7
WLUM-F	MILWAUKEE	WI	84	9.8	.5	2.7	2.2	79	9.2	.6	2.6	2.4
WLZR-F	MILWAUKEE	WI	20	2.3	.1	.7	.7	13	1.5	.2	1.0	1.0
WMIL-F	MILWAUKEE	WI	132	15.4	1.2	6.8	4.5	115	13.4	1.5	6.7	4.5
WMYX-F	MILWAUKEE	WI	15	1.8	-	-	-	9	1.1	-	-	-
WOKY-A	MILWAUKEE	WI	65	7.6	.4	2.1	1.7	62	7.2	.5	2.1	1.7
WQFM-F	MILWAUKEE	WI	186	21.7	2.0	11.6	16.5	175	20.4	2.7	11.9	17.4
WTMJ-A	MILWAUKEE	WI	159	18.6	1.1	6.2	3.1	123	14.4	1.1	4.7	2.6
WZTR-F	MILWAUKEE	WI	132	15.4	1.1	6.2	8.1	115	13.4	1.4	6.2	7.9
METRO SHARE CONTRIBUTION						56.2		55.9				
NON-METRO												
WHBL-A	SHEBOYGAN	WI	280	32.7	2.0	11.6	94.4	266	31.1	2.9	13.0	96.2
WJUB-A	SHEBOYGAN	WI	26	3.0	.1	.7	100.0	5	.6	.1	.5	100.0
WKTS-A	SHEBOYGAN	WI	63	7.4	.2	1.4	100.0	58	6.8	.4	1.6	100.0
WKTT-F	MANITOWOC	WI	97	11.3	.7	4.1	46.2	79	9.2	.9	4.1	53.3
WLTU-F	MANITOWOC	WI	13	1.5	-	-	-	13	1.5	.1	.5	8.3
WOMT-A	MANITOWOC	WI	8	.9	-	-	-	-	-	-	-	-
WQTC-F	MANITOWOC	WI	22	2.6	-	-	-	11	1.3	-	-	-

ARBITRON

County Report

1992 Edition Radio County Coverage

Fieldwork Conducted 1991

© 1992 The Arbitron Company

WISCONSIN

COUNTY:
SHEBOYGAN

HOME RADIO METROS:

POPULATION 12+: 85,600

IN-TAB: 304

TELEVISION ADI:
MILWAUKEE

ETHNIC WGT: NONE

METRO STATION COUNTY/STATE OF LICENSE			MONDAY - SUNDAY 8AM - MID					MONDAY - FRIDAY 8AM - 7PM				
			CUME		AQH		CTY SHR	CUME		AQH		CTY SHR
			(00)	RTG	RTG	SHR		(00)	RTG	RTG	SHR	
(CONTINUED)												
WWJR-F	SHEBOYGAN	WI	115	13.4	.7	4.1	100.0	99	11.6	1.1	4.7	100.0
WXER-F	SHEBOYGAN	WI	18	2.1	.2	1.4	66.7	18	2.1	.5	2.1	80.0
NON-METRO SHARE CONTRIBUTION						23.3					26.5	
OTHERS						4.1					2.6	
COUNTY TOTALS												
				CUME (00)		821			CUME (00)		817	
				CUME RTG		95.9			CUME RTG		95.4	
				AQH (00)		146			AQH (00)		193	

CERTIFICATE OF SERVICE

I, Artie King, Secretary in the law offices of Schwartz, Woods & Miller, do hereby certify, that I have on this 13th day of January 1993 sent by United States mail, postage prepaid, copies of the foregoing **COMMENTS** to the following:

Mr. Julian Jetzer
d/b/a Sheboygan Falls Broadcasting
N5589 State Highway 57
Plymouth, WI 53073

Bruce C. Herzog, P.E.
Broadcast Engineering Consultant
1435 Knapp Street
Oshkosh, WI 54901

Mr. Rick Duerson, General Manager
WGLQ Radio
524 Ludington Street
Escanaba, MI 49829

Mr. Walter P. Kaszynski, General Manager
WOCO-FM Radio
3829 Highway 22 West
Oconto, WI 54153



Artie King